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## STATE OF COLORADO

Bill Owens, Governor  
Jane E. Norton, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

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Colorado Department  
of Public Health  
and Environment

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March 5, 2001

Ms Bonita Lavelle  
Remedial Project Manager  
US EPA Region 8  
999 18<sup>th</sup> Street, Suite 500  
Denver, CO 80202-2466

Re: VBI70 OU1 Final Baseline Risk Assessment

Dear Bonnie:

The Colorado Department of Public Health and Environment ("CDPHE") requests that that EPA issue a draft final version of the Baseline Risk Assessment for VBI70-OU1 for review and comment before it is finalized. EPA has indicated that significant changes and additions have been made to the document since it's draft release in July 2000. Because of the importance of the document, the controversy surrounding its content, and the impact it will have on cleanup decisions, we believe an interim version and adequate time for all parties to review it are warranted

Discussions at the last working group meeting (2/1/01) indicate that national guidance is not likely to be available to resolve issues regarding quantitative risk assessment of acute arsenic toxicity or risk to pica children prior to release of the VBI70 baseline risk assessment. Therefore, quantitative estimates in the risk assessment document may focus, for now, on other soil exposure scenarios (such as sub-acute to chronic exposures or, potentially, additional emphasis on non-cancer effects). With this change in focus, we strongly recommend consideration of additional risk assessment techniques to better characterize the variability and uncertainty associated with risk estimates for soil ingestion. For instance, our review of the most recent Stanek and Calabrese paper (*Risk Analysis*, Vol. 20, No. 5, 2000) indicates there may be adequate data available to pursue a probabilistic analysis, such as Monte Carlo assessment, to help resolve discrepancies or provide perspective on discrepancies between point-estimates currently recommended by EPA and ATSDR. Such an approach could help establish a defensible interim soil action level until other issues can be resolved at the national level.

Please call me at 303-692-3395 if you have any questions about our concerns.

Sincerely,

Barbara O'Grady  
State Project Manager

Cc: VBI70 Working Group